

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

GENLYTE THOMAS GROUP LLC,
a Delaware Limited Liability Company
Plaintiff,

v.

ARCHITECTURAL LIGHTING SYSTEMS, a
division of ARCH LIGHTING GROUP, a
Rhode Island Corporation

Defendant.

Civil Action No. 05-CV-10945 WJY

PLAINTIFF'S MOTION TO COMPEL
RESPONSES TO DISCOVERY REQUESTS

Plaintiff Genlyte Thomas Group LLC ("Genlyte") moves the Court to compel Defendant, Arch Lighting Group ("ALS") to fully respond to Genlyte's discovery requests. As set forth in the accompanying memorandum, Genlyte has sought information from ALS related to the identification of ALS' customers or, in other words, the hospital or healthcare facility where ALS' accused products have been installed. Additionally, Genlyte has sought documentation related to the sales of the accused products to such healthcare facilities, including the specifications for such jobs. To date, however, ALS has failed to produce all of the requested information. Consequently, Genlyte respectfully requests this Court to enter the accompanying proposed Order compelling ALS to fully respond to Genlyte's discovery requests by identifying all customers (i.e., healthcare facilities) to which the accused products have been sold and to produce all documentation relating to such sales, including the job specification.

CERTIFICATION UNDER LR 7.1(A)(2)

The undersigned certifies that counsel for Genlyte have conferred with counsel for ALS in a good faith attempt to resolve or narrow the issue presented by this motion, that counsel have complied with the provisions of Local Rule 37.1, and that, despite their efforts, counsel were unable to resolve the issue.

Respectfully submitted,

/s/ John L. Capone
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Certificate of Service

I hereby certify that this document(s) filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants on this 20th day of November, 2006.

/s/ John L. Capone
Counsel for Plaintiff, Genlyte Thomas Group LLC